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18 *Counsel for Defendant FN America, LLC*

19 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

20 JAMES PARSONS, individually and as
21 Special Administrator of the Estate of Carolyn
22 Lee Parsons, and ANN-MARIE PARSONS,

23 Plaintiffs,

24 v.

25 COLT'S MANUFACTURING COMPANY
LLC, *et. al.*,

26 Defendants,

Case No. 2:19-cv-01189-APG-GWF

STIPULATION AND ORDER TO
EXTEND TIME FOR FN AMERICA, LLC,
FN HERSTAL, AND THE HERSTAL
GROUP TO RESPOND TO PLAINTIFF'S
COMPLAINT (First Request)

1 Plaintiffs, James Parsons and Ann-Marie Parsons (“Plaintiffs”) and Defendant, FN
 2 America, LLC (“FN America”), pursuant to Fed. R. Civ. P. 6(b)(1), D. Nev. LR IA 6-1 and 6-2,
 3 and LR 7-1, file this stipulation seeking up to and including September 24, 2019 as the deadline by
 4 which FN America, FN Herstal, and the Herstal Group (collectively, the “FN Defendants”) may
 5 move, respond, answer or otherwise plead to the Complaint in this matter. This is the parties’ first
 6 request to extend the time for the FN Defendants to respond to Plaintiffs’ Complaint. This
 7 requested extension of time is sought in good faith and not for purposes of causing any undue
 8 delay.
 9

10 To date, Plaintiffs have yet to serve the FN Defendants with process in this case. Counsel
 11 for the FN Defendants have agreed to accept service of process on behalf of their clients, and the
 12 parties have agreed that in doing so and in filing this stipulation that the FN Defendants have in no
 13 way impaired their right to seek dismissal of this case on any grounds, including lack of personal
 14 jurisdiction.
 15

16 WHEREFORE, Plaintiffs and the FN America respectfully request that the Court enter an
 17 Order providing that the FN Defendants have until September 24, 2019 to move, respond, answer
 18 or otherwise plead to Plaintiffs’ Complaint.
 19

20 Dated this 26th day of July, 2019.

21 **MATTHEW L. SHARP, LTD.**

22
 23 /s/ Matthew L. Sharp

24 Matthew L. Sharp (Nev. #4746)

25 Matthew L Sharp, LTD.

432 Ridge Street

26 Reno, NV 89501

27 Richard H. Friedman (Nev. #12743)

Friedman Rubin PLLP

1126 Highland Avenue

28 Bremerton, WA 98337

Dated this 26th day of July, 2019.

SPENCER FANE LLP

/s/ Jessica E. Chong

John H. Mowbray (NV Bar No. 1140)

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and

1 Joshua D. Koskoff (*Admitted Pro Hac Vice*)
2 Katherine L. Mesner-Hage (*Admitted Pro Hac*
3 *Vice*)
4 Koskoff, Koskoff & Bieder, PC
5 350 Fairfield Avenue
6 Bridgeport, CT 06604
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301 Fayetteville Street, Suite 1700
Raleigh, NC 27601
Counsel for FN America, LLC

8
9 **ORDER**

10 IT IS SO ORDERED.

11 
12 _____
UNITED STATES MAGISTRATE JUDGE

13 7/29/2019

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DATED
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the **STIPULATION AND ORDER TO
EXTEND TIME FOR FN AMERICA, LLC, FN HERSTAL, AND THE HERSTAL
GROUP TO RESPOND TO PLAINTIFF'S COMPLAINT (First Request)** was served on the
following on July 26, 2019 via first class U.S. Mail:

Maverick Investments LP
c/o Joseph A. Wyson, R/A
358 Torino Avenue
Las Vegas, NV 89123

Daniel Defense, Inc.
c/o Daniel C. Marvin, R/A
101 Warfighter Way
Black Creek, GA 31308

Colt's Manufacturing Company LLC
and Colt Defense, LLC
c/o Corporation Service Company, R/A
251 Little Falls Drive
Wilmington, DE

Christensen Arms Hunting, Inc.
c/o Protection Services, Inc., R/A
136 E South Temple, Suite 1050
Salt Lake City, UT 84111

Lewis Machine & Tool Co.
c/o Karl R. Lewis, R/A
1305 West 11th Street
Milan, IL 61264

LWRC International, LLC
c/o Capitol Corporate Services, Inc., R/A
3206 Tower Oaks Blvd, 4th Floor
Rockville, MD 20852

Noveske Rifleworks LLC
c/o Lorina Noveske, R/A
594 NE E Street
Grants Pass, OR 97526

Patriot Ordnance Factory, Inc.

